

## STATEMENT OF FACTS

Your affiant, Michael Jeng, is a Special Agent of the Federal Bureau of Investigation (“FBI”) and has been an agent since June 2, 2017. I am assigned to a squad that investigates organized criminal enterprises. As a Special Agent of the FBI, I received training in investigating violations of federal statutes, including those regarding bank fraud, mail fraud, wire fraud, and money laundering. I have participated in a number of investigations regarding criminal enterprises and financial crimes, both as a Special Agent and as a Staff Operations Specialist for the FBI. I have also conducted physical and electronic surveillance, researched tactical and strategic criminal enterprise intelligence, and analyzed records of fraudulent activity. As a Special Agent, I am authorized to investigate violations of laws of the United States and am authorized to execute warrants issued under the authority of the United States.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. At around 1:00 p.m. EST, known and unknown individuals broke through the police lines, toppled the outside barricades protecting the U.S. Capitol, and pushed past USCP and supporting law enforcement officers there to protect the U.S. Capitol. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President

Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

On or about January 11, 2021, a member of the public (“WITNESS 1”) sent several videos to the FBI that WITNESS 1 had taken of video clips that had been posted to the Instagram account GREGG54321. The clips appeared to depict several individuals participating in the U.S. Capitol riot and incursion on January 6, 2021. They also included several written narratives claiming that the user of GREGG54321 had entered the U.S. Capitol on that day with other members of his party. From my training and experience, I know that Instagram users can post video clips and written narratives to their accounts. Instagram users can also include comments on their video clips as well. WITNESS 1 informed the FBI that the user of GREGG54321 was GREGORY RICHARD PURDY (PURDY), and that PURDY can be seen in the videos as the Caucasian male with blond hair carrying a backpack and wearing a red, white, and blue jacket, jeans, and occasionally a red hat (see Figure 1).



Figure 1

The FBI watched the videos and observed a clip that appeared to show PURDY at the head of a bus with the caption “Will be in DC in 1 hour!” (see Figure 2).



*Figure 2*

In a second clip, PURDY can be seen walking down what appeared to be an area of Washington, D.C. and addressing the viewer, “Listen brothers and sisters, we come in peace today. But I swear to God, if the Antifa touches me, or my family, I’ll headbutt them in the f----- [inaudible] bro. Straight elbow, left hook” (see Figure 3). PURDY simultaneously makes motions that appear to simulate striking someone. Another individual, who appeared to be an older Caucasian male wearing a blue jacket, can also be seen in the clip (see Figure 4). PURDY addresses this individual as “dad”. The FBI conducted research on open source databases and social media and learned that PURDY’s father is Gregory Purdy-Schwartz (Purdy-Schwartz). Images of Purdy-Schwartz found online appeared to resemble the individual that PURDY addressed as “dad” as well, leading the FBI to believe that this individual was Purdy-Schwartz.



Figure 3



Figure 4

In a third clip, PURDY can be seen in what appeared to be a street in Washington, D.C. addressing the viewer, “We’re not letting this steal happen. We’re not letting this travesty against democracy happen, because that’s what it is. We’re going to the Capitol right now, we’re marching there . . .” (see Figure 5). In a fourth clip, which appeared to be a continuation of the third clip, the camera panned to show that when PURDY said this, he was in the immediate vicinity of an intersection that appeared to be adjacent to the National Museum of African American History and Culture, a Smithsonian museum located at 1400 Constitution Ave, NW, Washington, D.C. 20560.



*Figure 5*

In a fifth clip, the FBI observed an unknown younger Caucasian male (“PERSON 1”) wearing a tan jacket, backpack, jeans, and blue facemask (see Figure 6). In a sixth clip, the FBI observed another unknown older Caucasian male (“PERSON 2”) that had facial hair and wore a dark blue hooded sweatshirt and a dark blue cap speaking to PURDY (see Figure 7).



Figure 6



Figure 7

In a seventh clip, the account user of GREGG54321 posted a narrative that read, “I got my Ass kicked by 10 cops, pepper sprayed, tear gassed, and a ripe ass beating with the Batons . . . More info to come! Videos of inside the capital building with @mattcpurdy and @bobtheplumbr1982 . . . I LOVE MY COUNTRY!!!! STOP THE STEAL!!!!” (see Figure 8). I know from my training and experience that Instagram users can tag other Instagram accounts with the “@” symbol, indicating that MATTCPURDY and BOBTHEPLUMBR1982 were two other Instagram accounts.



Figure 8

In an eighth clip, the account user posted a narrative that read in part, “Today was about taking our democracy back! We have undisputed evidence of major voter fraud . . .” (see Figure 9).



Figure 9

In a ninth clip, PURDY posted a narrative that read in part, “Today my group and I were key players in conducting peaceful pushes. The game plan was to talk the officers [sic] and tell the [sic] to STOP FOLLOWING ORDERS AND UPHOLD THE CONSTITUTION. . . . When they didn’t listen we pushed through (without hitting them of course) we did these peaceful pushes all the way into the capital [sic] building . . .” (see Figure 10).

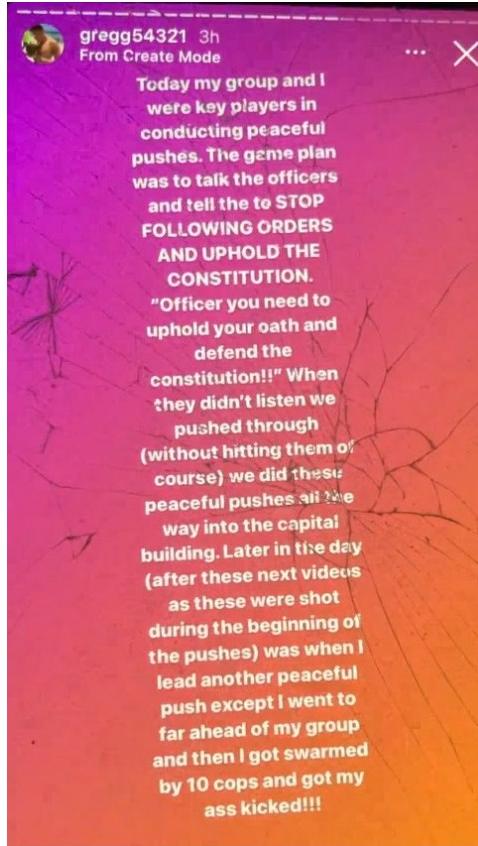


Figure 10

In a tenth clip, an individual that appeared to be PURDY can be seen amongst a crowd of protestors yelling at what appeared to be several Metropolitan Police Department (MPD) officers outside the U.S. Capitol. PURDY also appeared to post a comment in this clip that stated in part, “. . . this was an intense moment !!!! (I’m to the left . . .)” (see Figure 11). In an eleventh clip, which appeared to be a continuation of the tenth clip, PURDY appeared to post a comment that stated, “Peep my war cry at the end as we push through this riot team after they didn’t listen to us . . .” (see Figure 12).

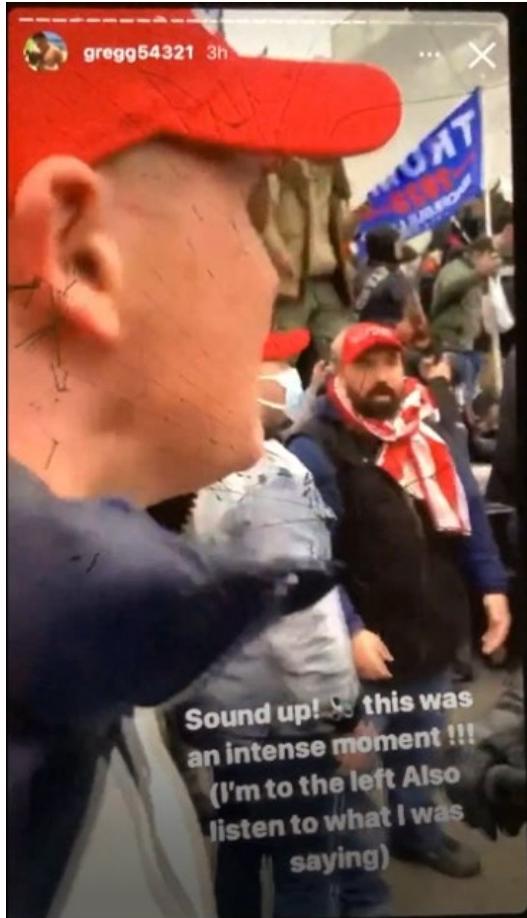


Figure 11



Figure 12

In a twelfth clip, PURDY can be seen standing amongst a group of protestors on what appeared to be an elevated outdoor area of the U.S. Capitol grounds. In the clip, PURDY stated, “Right now we’re on top of the Capitol. Everybody stormed through. We’re the second wave coming in. Look at what they’re f----- doing bro . . . [at this point, the clip panned to the ground to show what appeared to be blood stains].” The clip also included a comment that stated, “This was just after the last video after we successfully got through their first force !!! Look at the f----- blood on the ground . . .” (see Figure 13). PURDY also stated in this clip, “It’s raining tear gas, it’s raining pepper spray, we’re not going to let them do this to us. It’s f----- b---s---.” The clip then panned to show PERSON 2, who stated, “It’s b---s----.” When PERSON 2 entered frame, the clip then included a comment that read in part, “Me and my uncle always got each other’s back lol! . . . @bobtheplumbr1982 . . . ” (see Figure 14). This led the FBI to believe that PERSON 2 was the user of the Instagram account BOBTHEPLUMBR1982.



Figure 13



Figure 14

In a thirteenth clip, PURDY can be seen amongst a group of rioters outside what appeared to be the U.S. Capitol. The rioters appeared to be moving towards the Capitol and stepped over what appeared to be barricades that had fallen over. A comment in this clip read, “This was just after we pushed the top level gates over. The cops were swinging their batons trying to keep us back. (Like 30 of them) But after talking to them telling them to “UPHOLD THE CONSTITUTION” that helped a lot because instead of fighting us super hard like the last ones on the previous slide we easily pushed through them and they all ran !!!” (see Figure 15).



Figure 15

In a fourteenth clip, there is a post that appears to be footage taken from inside the U.S. Capitol. Other rioters could be seen in the background. PURDY included a comment that read in part, “Inside the capital [sic] getting tear gassed!” (see Figure 16).



Figure 16

In a fifteenth clip, PURDY posted a narrative that read in part, “Will post more footage from inside the capital [sic] tomorrow afternoon . . . Ill [sic] also talk about how I got out of it with NO CHARGES and nothing on my record and got out of DC without being in a jail cell (Yes you read that right!!!!) . . . p.s. if your [sic] wondering why I’m so open about this it’s because I DON’T GIVE A F--- . . . ” (see Figure 17).

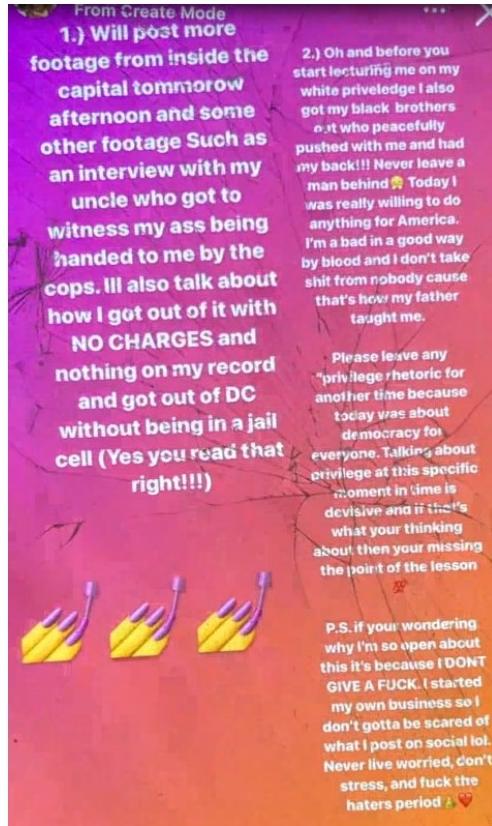


Figure 17

The FBI obtained body camera footage from two MPD officers that had been deployed to protect the U.S. Capitol on January 6, 2021. The first officer's footage appeared to show PURDY, Purdy-Schwartz, PERSON 1, and PERSON 2 amongst a group of protestors standing opposite of the officers (see Figures 18 and 19). PURDY, Purdy-Schwartz, and PERSON 2 could be seen yelling at the officers, while PERSON 1, now wearing a gray cap, appeared to film the interaction with a red cellphone (see Figure 19). At one point, PURDY appeared to be yelling, "You gotta let us by . . . You don't have to listen to them . . . tell your guys . . ." Purdy-Schwartz appeared to yell, "You're going to have to make a decision . . ." The crowd then appeared to push forward against the officers and Purdy-Schwartz can be seen making contact with an officer (see Figure 20). In the same video, PERSON 1 gets extremely close to police officers and appears to be pushing up against the police line (see Figure 20). The second officer's footage also showed this sequence of events and showed that when the crowd pushed forward it appeared that PURDY made contact with an officer as well (see Figure 21, in which PURDY's red, white, and blue jacket can be seen on the right). That video also shows PERSON 1 as part of the crowd that is pushing against the police line (see Figure 21, in which PERSON 1 is the individual with the tan jacket). PERSON 1 appears to be filming these interactions with his cell phone. Both officers' footage showed that these events occurred on January 6, 2021 from approximately 2:01pm to 2:02pm.



Figure 18



Figure 19



Figure 20



Figure 21

The FBI obtained footage from surveillance cameras located inside the U.S. Capitol. The footage was taken on January 6, 2021. One camera located in the Senate wing showed that PURDY, PERSON 1, and PERSON 2 appeared to enter the Capitol at approximately 2:13pm on this day amongst a crowd of protestors (see Figure 22). They did so after several protestors broke what appeared to be a window, entered the building, and then kicked open a door that allowed other protestors, including PURDY, PERSON 1, and PERSON 2, to enter through. Additional footage showed that these three appeared to remain in the Capitol until at least 2:16pm. (see Figures 23 and 24).



Figure 22

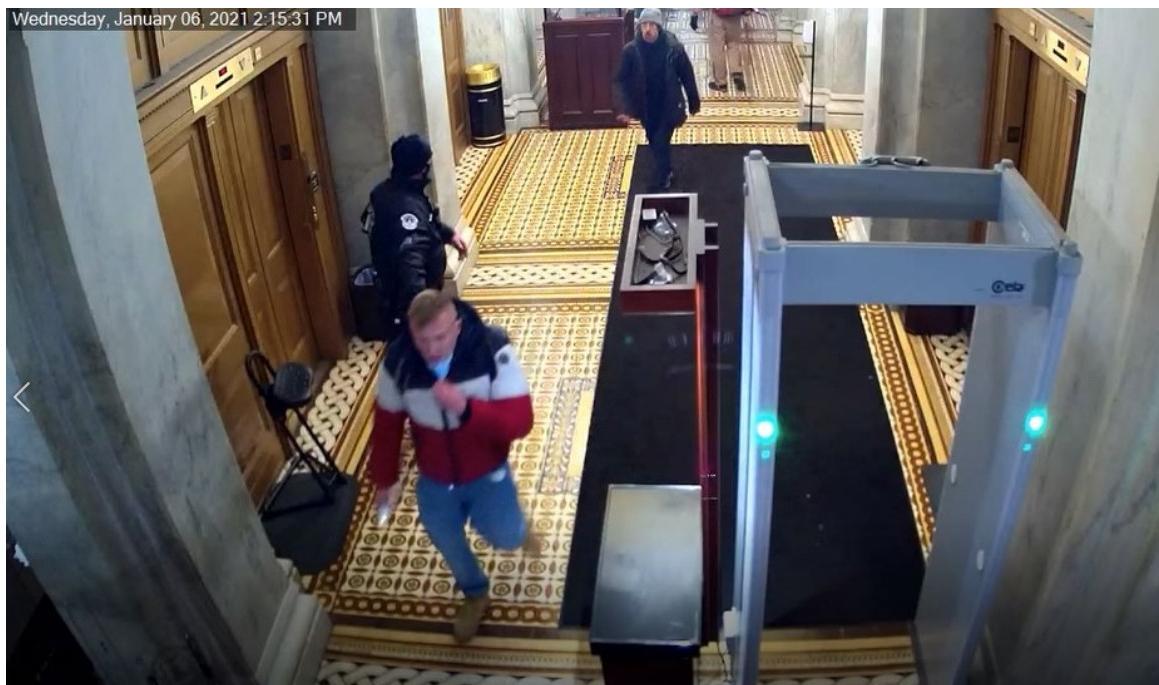


Figure 23

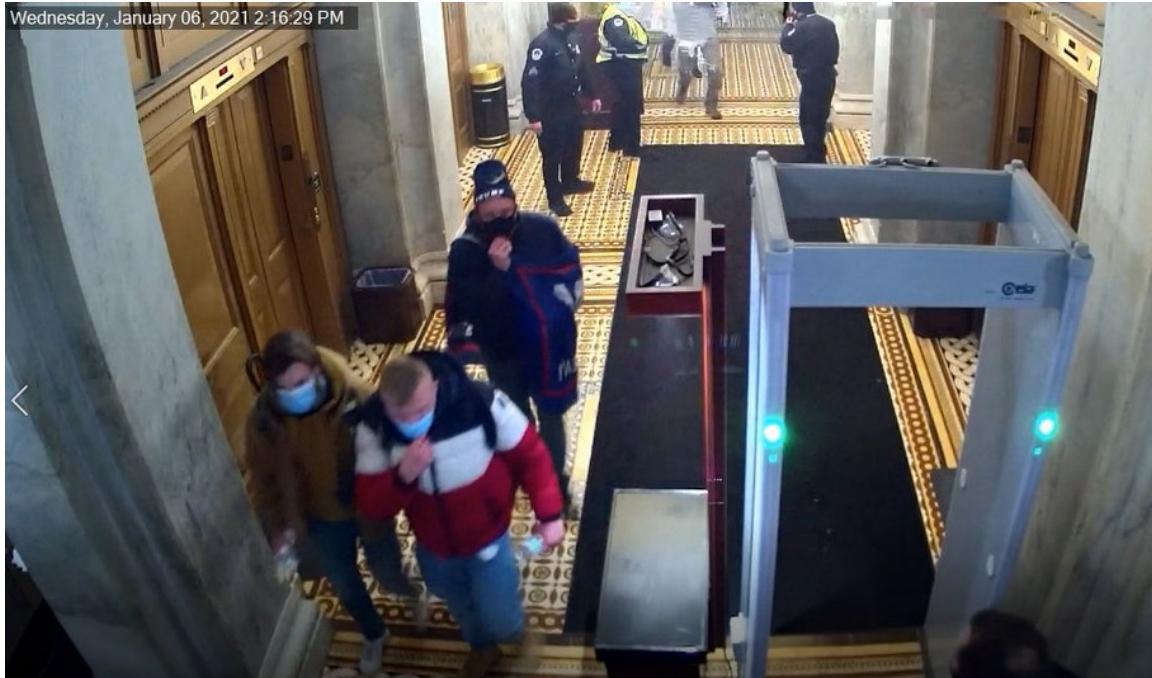


Figure 24

The FBI obtained footage from the body cameras of three additional MPD officers (OFFICER 1, OFFICER 2, and OFFICER 3) that had been deployed to protect the U.S. Capitol on January 6, 2021. OFFICER 1's footage showed that at approximately 3:24pm, PURDY and PERSON 2 appeared to stand opposite of the MPD officers amongst a group of protestors at an area outside of the Capitol building (see Figure 25). PURDY could be heard saying to the officers, "We're on the same team. You don't have to take these orders." PERSON 2 said to the officers, "Stop taking orders. We're not here – we're not here to kill or hurt anybody, we're making our voice heard. You should be behind us." PURDY later said to the officers, "Are you guys going to let us in, or are we gonna have to push in?" At various times, PURDY appeared to wave others in the crowd behind him to move forward. At approximately 3:30pm, PURDY yelled to the crowd, "Guys, we all gotta go at once." PURDY then counted down from ten to one; upon reaching one, PURDY then ran forward into OFFICER 1 and pushed his way past the police line (see Figure 26). Several MPD officers, including OFFICER 1, chased PURDY and restrained him. Footage from OFFICER 2's body camera showed that after PURDY ran forward, PERSON 2 followed by also running forward and pushing against the officers (see Figure 27, where PERSON 2 can be seen on the right). Footage from OFFICER 3's body camera showed that when PERSON 2 ran forward, PERSON 2 pushed into OFFICER 3 in an attempt to get past OFFICER 3 (see Figure 28).



Figure 25



Figure 26

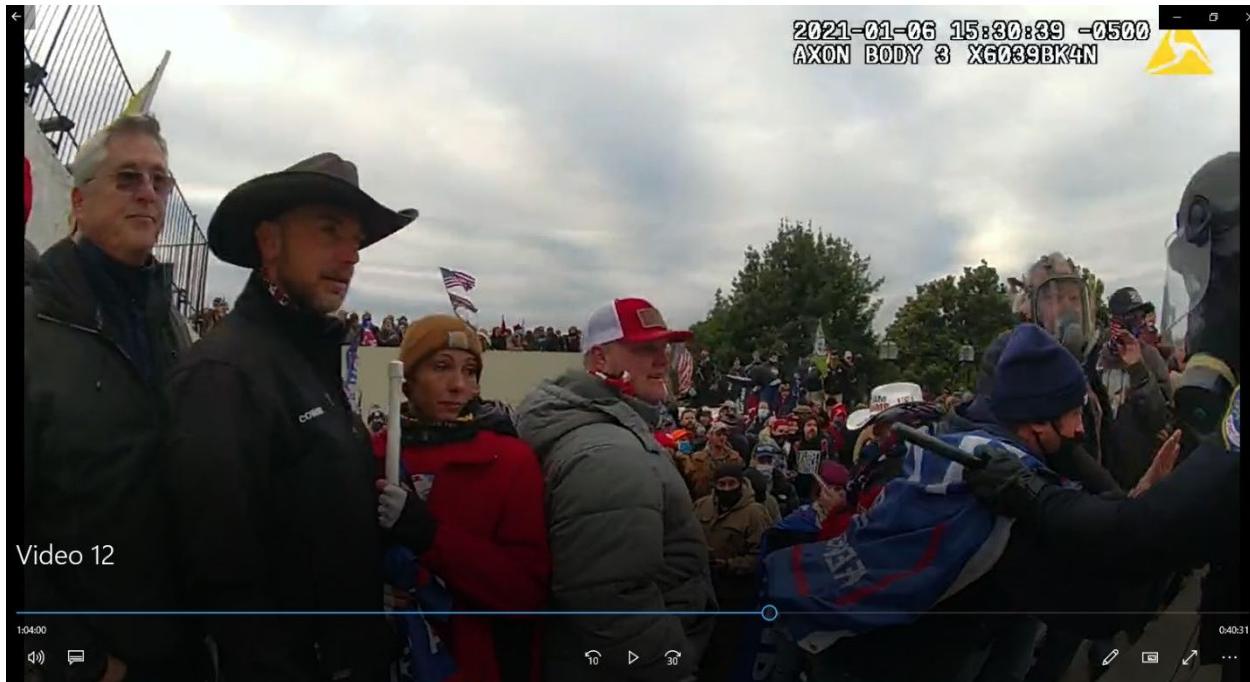


Figure 27



Figure 28

OFFICERS 1, 2, and 3 were interviewed by the FBI. When interviewed, the FBI showed them still shots of PURDY and PERSON 2 taken from their respective body camera footages. The still shots encompassed the actions of PURDY and PERSON 2 at or about 3:30pm, when they attempted to push past the officers. OFFICER 1 recognized PURDY as the individual that conducted a countdown before running into him (OFFICER 1) and other officers. OFFICER 1 confirmed that he was involved with restraining PURDY. OFFICER 2 also recognized PURDY and confirmed that PURDY had attempted to push past officers. OFFICER 3 recognized PERSON 2 and confirmed that PERSON 2 had pushed into him (OFFICER 3) after PURDY had conducted the countdown.

The FBI issued a subpoena to Facebook, Inc. (the company that owns Instagram) for subscriber information pertaining to the Instagram accounts GREGG54321, MATTCPURDY, and BOBTHEPLUMBR1982. The results showed that GREGG54321 was registered with the email address [REDACTED]@gmail.com” and the telephone number [REDACTED]-0998. It also appeared to be linked to another Instagram account called SOCIALMEDIABREAK123. The account MATTCPURDY was registered with the email address [REDACTED]@gmail.com” and the telephone number [REDACTED] 5977. The account BOBTHEPLUMBR1982 was registered under the name “Bob Turner”. Open source research showed that the numbers [REDACTED] 0998 and [REDACTED] 5977 were associated with PURDY and MATTHEW PURDY (MATTHEW), respectively.

The FBI obtained photographs of TURNER from the New York’s Department of Motor Vehicles (DMV) as well as booking photographs from two police departments located in New York of TURNER from when he was arrested by them and compared it to the footage of PERSON 2. From these comparisons, the FBI believes that PERSON 2 is TURNER.

The FBI interviewed WITNESS 1 multiple times. WITNESS 1 stated that he/she had personally interacted with PURDY and MATTHEW in the past and was able to recognize their images and voices. WITNESS 1 had never interacted with Purdy-Schwartz before but had seen him on social media accounts belonging to PURDY and MATTHEW and knew him to be their father. WITNESS 1 was shown footage from the MPD officers’ body cameras, the U.S. Capitol surveillance cameras, and from Instagram account GREGG54321.

WITNESS 1 confirmed that PURDY was the individual in Figures 1, 2, 3, 5, 11, 13, and 15. WITNESS 1 also identified PURDY as the individual with the red, white, and blue jacket in Figure 18, Figure 19, the middle of Figure 22, Figure 23, and Figure 24. In addition, WITNESS 1 identified PURDY as the individual wearing the red, white, and blue jacket and pulling his mask down in Figure 25 as well as the individual running towards the camera in Figure 26.

WITNESS 1 further confirmed that PERSON 1 was MATTHEW. WITNESS 1 identified MATTHEW as the person shown in Figure 6. WITNESS 1 further identified MATTHEW as the person wearing a gray hat and blue mask in Figure 18, and the individual on the far left of Figure 19 wearing a gray hat and holding a red cellphone. WITNESS 1 also identified MATTHEW as the individual with the tan jacket holding the red cellphone, and standing behind PURDY, in Figure 22. WITNESS 1 identified the man with the tan jacket in Figure 24 as MATTHEW.

WITNESS 1 identified Purdy-Schwartz as the individual in Figure 4. WITNESS 1 stated that Purdy-Schwartz was the individual wearing the red hat with a mask on his chin, on the right portion of Figure 19. WITNESS 1 further identified Purdy-Schwartz as the individual with the mask on his chin in Figure 20.

WITNESS 1 also informed the FBI that following the January 6, 2021 events, PURDY appeared to de-activate his GREGG54321 Instagram account and instead appeared to use the account SOCIALMEDIABREAK123.

Law enforcement interviewed WITNESS 2. WITNESS 2 was an individual that had personally interacted with TURNER in the past and could recognize his voice and image. WITNESS 2 was shown footage from the MPD officers' body cameras, the U.S. Capitol surveillance cameras, and from Instagram account GREGG54321. WITNESS 2 confirmed that TURNER was pictured in Figure 7. WITNESS 2 also confirmed that TURNER was the Caucasian individual in Figures 19 and 25 with a goatee and wearing what appeared to be a blue knit cap with "TRUMP" displayed on it.

On March 22, 2021, the FBI executed a search warrant (21-SC-953) on Facebook, Inc. The warrant targeted the Instagram accounts GREGG54321, MATTCPURDY, and BOBTHEPLUMBR1982. Upon receiving the results of the search warrants, the FBI requested a filter team to review the results for GREGG54321 and to omit any information that appeared to be privileged, as the FBI was aware that PURDY had retained legal counsel as a result of this investigation. Upon the completion of the filter review, your affiant reviewed the filtered results. Below is information discovered that pertains to this investigation.

GREGG54321:

- a. A screenshot was discovered that appeared to show the results of an Internet search of a quote supposedly said by Benjamin Franklin. The quote said, “We need a revolution every 200 years, because all governments become stale and corrupt after 200 year...” Above this was an Instagram poll that appeared to have been added by the user asking, “Do you agree?” with the options to check yes or no (see Figure 29). From training and experience, I know that Instagram users can add polls such as this to their content for other Instagram users to take.

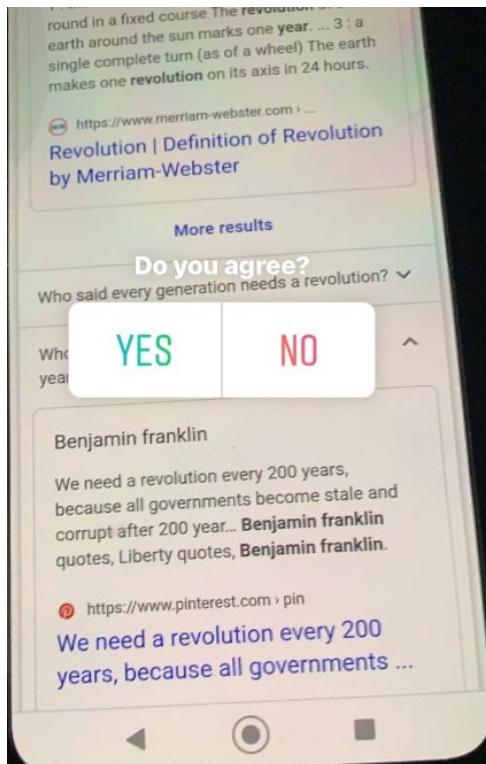


Figure 29

- b. image of what appeared to be a flyer advertising President Donald Trump's speech on January 6, 2021 was found with a message that appeared to have been added by the user that stated, "On my way to D.C now...will be on live later !!!" (See Figure 30).

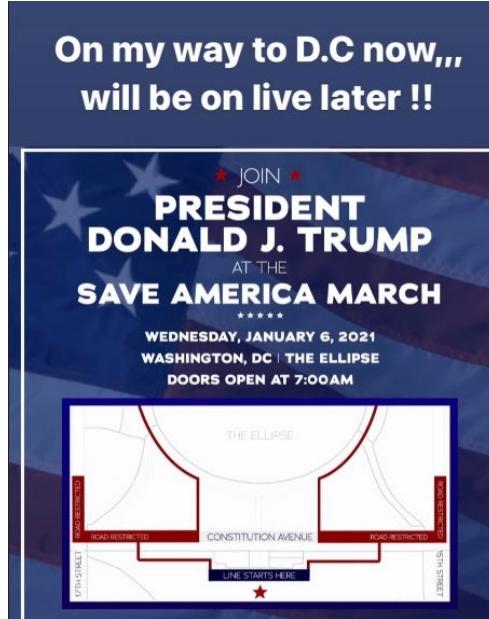


Figure 30

- c. A series of videos were discovered that appeared to show PURDY and TURNER sitting in the back seats of a vehicle as it drove at night. They appeared to discuss the January 6 events, specifically their interactions with law enforcement. The footage appeared to be taken by a cellphone camera in PURDY's hands. Specific quotes include:
  - i. PURDY said to an unknown individual driving the vehicle, "Hold on, what did you just say? Just repeat that." The driver replied, "No, I'm not saying it because I know you're recording." PURDY then said, "No, you just f----- said that this is the song you thought of when we were going into the Capitol. Turn this up. It's the f----- Halo theme song." Of note, the driver appeared to be wearing a tan jacket similar to that which MATTHEW was wearing that day. The camera was also recording the display console at the front of the vehicle, which showed the time to be 10:48. This led your affiant to believe that the videos were likely taken the evening of January 6, as PURDY and his party were driving home from Washington, D.C.
  - ii. PURDY said to TURNER, "We're getting everybody pumped up...six, five, four, three, two..." and TURNER said, "When you hit one, I turned around and I bum rushed them. I knew you were bum rushing them too."
  - iii. PURDY said, "Like if your government does not follow the law and undermines democracy...wouldn't force be kind of necessary?"
  - iv. PURDY said, "Given those circumstances, it's our job to uphold the Constitution and do a f----- rebellion." TURNER replied, "I called for a revolution, yes. A revolution."
  - v. PURDY said, "We had enough people, they just weren't scrunched up enough. If you had people, and there's space between the people, by the time those first people go, the thirty f----- cops come in and they stop

- them, that's what happened." TURNER could be heard throughout agreeing with PURDY.
- vi. PURDY said, "There needs to be the right hearings, a special counsel, something has to be done and today was a huge step toward it."
- vii. PURDY said to the camera, "That's just a brief f----- story of what happened. We'll tell the full thing tomorrow, but it was epic as f---, today was epic."
- d. Two images were found that appeared to be screenshots taken of GREGG54321's account. The first (see Figure 31) appeared to show a notification from Instagram that some of the content involving the January 6 events would be removed for violating Instagram's policies. The second (see Figure 32) appeared to be a message from the account user stating, "Instagram took down half my stories!!! B---s---!!"

Your Account May Be Deleted

Some of your previous posts didn't follow our [Community Guidelines](#). If you learn and follow our guidelines, you can prevent your account from being deleted.

Story removed for violence or dangerous organizations  
Posted Jan 6, 2021 at 12:29:03 PM

Story removed for violence or dangerous organizations  
Posted Jan 6, 2021 at 7:26:24 PM

Story removed for violence or dangerous organizations  
Posted Jan 6, 2021 at 7:07:44 PM

Story removed for violence or dangerous organizations  
Posted Jan 6, 2021 at 7:58:32 PM

**This country is in major trouble.  
Our media is corrupt  
Social media is fucked  
(they shut down Trumps Twitter. Now he can't even speak!)  
This is what communism looks like!  
Censorship and no democracy. A stolen election.**

Figure 31



Figure 32

BOBTHEPLUMBR1982:

- a. A video was found that appeared to show a crowd of protesters standing opposite of a line of police officers outside the U.S. Capitol building. The video appeared to have been taken by a cellphone and indicated that the cellphone holder was standing amongst the crowd. Your affiant recognized some of the protestors from the body camera footage from OFFICERS 1, 2, and 3 from when PURDY and TURNER ran into OFFICERS 1 and 3 at approximately 3:30pm. The name tags of OFFICERS 1, 2, and 3 could also be seen in the video.
- b. A second video was found that showed PURDY and MATTHEW standing on what appeared to be an elevated outdoor area of the U.S. Capitol grounds amongst other protestors. MATTHEW was filming PURDY with a cellphone while PURDY spoke. PURDY could be heard saying, "We're not going to let them do this to us. It's f----- b--- s---." TURNER's voice can then be heard saying, "It's b--- s---." This video appeared to depict events described earlier in this affidavit regarding Figures 13 and 14 from TURNER's perspective.

Based on the foregoing, your affiant submits that there is probable cause to believe that GREGORY RICHARD PURDY and ROBERT TURNER violated 18 U.S.C. § 231(a)(3) and 18 U.S.C. § 2, which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of 18 U.S.C. § 231, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.

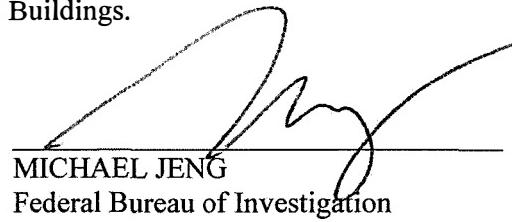
There is probable cause to believe that GREGORY RICHARD PURDY and ROBERT TURNER violated 18 U.S.C. § 111(a)(1) and 18 U.S.C. § 2, which makes it a crime for anyone to forcibly assault, resist, oppose, impede, intimidate, or interfere with any United States law enforcement officer while that officer is /.engaged in the performance of their official duties.

There is probable cause to believe that GREGORY RICHARD PURDY and ROBERT TURNER violated 18 U.S.C. § 1512(c)(2) and 18 U.S.C. § 2, which makes it a crime to corruptly obstruct, influence, or impede any official proceeding, or attempt to do so and aiding and abetting. Under 18 U.S.C. § 1515, congressional proceedings are official proceedings.

There is probable cause to believe that GREGORY RICHARD PURDY, ROBERT TURNER, and MATTHEW PURDY violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a

posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that GREGORY RICHARD PURDY, ROBERT TURNER, and MATTHEW PURDY violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



MICHAEL JENG  
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone, this 3rd day of November, 2021

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G. MICHAEL HARVEY  
U.S. MAGISTRATE JUDGE